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11 UNITED STATES DISTRICT COURT
12 NORTHERN DISTRICT OF CALIFORNIA
13 SAN FRANCISCO DIVISION

14 UNITED STATES OF AMERICA,)
15 Plaintiff,) No. CV 08-02331 JL
16 v.)
17 APPROXIMATELY \$104,994 IN UNITED)
18 STATES CURRENCY,)
19 Defendant.)
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**STIPULATION TO STAY PROCEEDING
PURSUANT TO 18 U.S.C. § 981(g) and
PROPOSED ORDER**

IT IS HEREBY STIPULATED by and between plaintiff United States of America and claimant Todd Dunphy, through undersigned counsel, that this action be stayed pursuant to 18 U.S.C. § 981(g) and 21 U.S.C. § 881(i).

Claimant Todd Dunphy is currently the subject of a related criminal investigation in Hawaii. The allegations in the forfeiture complaint are based, in large part, on the allegations at issue in the related criminal investigation. Consequently, the parties agree that a stay in the forfeiture proceeding is appropriate in order for the parties to evaluate the issues to be raised in the pending indictment and to

1 determine how that criminal proceeding will affect the present case.

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3 IT IS SO STIPULATED:

JOSEPH P. RUSSONIELLO
United States Attorney

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6 Dated: June 17, 2009

/S/
DAVID COUNTRYMAN
Assistant United States Attorney

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10 Dated: June 17, 2009

/S/
DAVID M. MICHAEL
Attorney for Claimant
Todd Dunphy.

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14 **ORDER GRANTING STAY**

15 UPON CONSIDERATION of the Stipulation to Stay, the entire record, and for good
16 cause shown, it is by the Court on this 19th day of June, 2009
17 Case Management Conference is continued to August 12,
18 ORDERED that the instant case be, and hereby is, STAYED, until _____,
2009, at 10:30 a.m. pursuant to 18 U.S.C. § 981(g).

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HONORABLE JAMES LARSON
United States Magistrate Judge